

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

HORTON,

*Plaintiff,*

v.

TEXAS FEDERATION FOR CHILDREN  
PAC, INC.,

*Defendant.*

Civil Action No. 3:22-cv-2736-D

**DEFENDANT’S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendant Texas Federation for Children PAC, Inc. respectfully moves this Court for a 14-day enlargement of time, up to and including January 13, 2023, in which to respond to answer Plaintiff’s complaint or file a motion to dismiss. To thoroughly respond to Plaintiff’s complaint: (i) Defendant must gather information from multiple third parties, some of which will likely be addressed in a declaration for the Court, concerning certain of Plaintiff’s claims; and (ii) Defendant’s outside counsel is in the process of hiring additional counsel with the appropriate subject-matter expertise in federal Telephone Consumer Protection Act litigation. Due to the timing of Plaintiff’s filing of the complaint and service, Defendant’s answer is due at a time when Defendant’s in-house counsel and outside counsel are out of the office on vacation for the Christmas and New Years’ holidays.

Consequently, this motion for enlargement of time is necessary for defense counsel to coordinate with multiple third parties and consult with additional outside counsel to determine litigation strategy and prepare the answer or motion to dismiss.

Defendant's counsel conferred with Plaintiff regarding the relief sought in this motion via email on December 16, 2022, and Plaintiff advised Defendant's counsel that he would not be opposed to such relief.

### **CONCLUSION**

For the foregoing reasons, Defendant respectfully moves this Court for a 14-day enlargement of time, up to and including January 13, 2023, in which to respond to answer Plaintiff's complaint or file a motion to dismiss. A Proposed Order granting the enlargement of time is attached to this motion.

Dated: December 20, 2022

Respectfully submitted,

/s/ Chris K. Gober

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\*Pro Hac Application Forthcoming